

# **Exhibit UU**

1  
2 IN THE UNITED STATES DISTRICT COURT  
3 FOR THE SOUTHERN DISTRICT OF NEW YORK

4 -----x  
5 EASTERN PROFIT CORPORATON LIMITED,  
6 Plaintiff/Counterclaim Defendant,

7  
8 Case No. 18-cv-2185

9 v.

10 STRATEGIC VISION US, LLC,  
11 Defendant/Counterclaim Plaintiff.

12 -----x  
13 1:47 p.m.  
November 19, 2019

14  
15 405 Lexington Avenue  
New York, New York

16  
17 DEPOSITION of FRENCH WALLOP, testifying  
18 under Rule 30(b)(6) on behalf of STRATEGIC VISION  
19 US, LLC in the above entitled matter, pursuant to  
20 Notice, before Stephen J. Moore, a Registered  
21 Professional Reporter, Certified Realtime Reporter  
22 and Notary Public of the State of New York.  
23  
24  
25

<p style="text-align: right;">Page 14</p> <p>1 FRENCH WALLOP</p> <p>2 Q Okay. What do those entries</p> <p>3 mean?</p> <p>4 A Well, it's Mike Waller and</p> <p>5 French Wallop in New York meeting Guo at 11:00</p> <p>6 a.m., which was about ten days after the</p> <p>7 contract was underway.</p> <p>8 It was actually underway</p> <p>9 earlier, but we gave him a leeway of ten days;</p> <p>10 so that's why I have ten days after.</p> <p>11 Q Looking up, sort of directly up</p> <p>12 in that column, on January 5th, there is an</p> <p>13 entry there that says, "Contract signed." Do</p> <p>14 you see that?</p> <p>15 A Yes.</p> <p>16 Q So I am trying to understand,</p> <p>17 what does your entry on the 26th above the "ten</p> <p>18 days after," what does that correspond to?</p> <p>19 A Well, if you go back ten days,</p> <p>20 that would get it to the 16th, right?</p> <p>21 The 16th of January, and we had</p> <p>22 said to Guo at that meeting that it would have</p> <p>23 been -- we were giving him an additional ten</p> <p>24 days like credit, because we were trying to get</p> <p>25 the team set up and we didn't get the wires</p>	<p style="text-align: right;">Page 16</p> <p>1 FRENCH WALLOP</p> <p>2 \$25,000.</p> <p>3 Q Then there is an EXP. Does that</p> <p>4 mean expenses?</p> <p>5 A Yes. I'm sorry.</p> <p>6 Q So, the \$25,000 wire to</p> <p>7 Georgetown Research was for expenses?</p> <p>8 A It was.</p> <p>9 Q Was it you who was in charge of</p> <p>10 setting up the wires?</p> <p>11 A Yes.</p> <p>12 Q Could you explain to us the</p> <p>13 entry on January 31st?</p> <p>14 A Yeah, it was Michael Waller</p> <p>15 returns with flash drive to Newark, and he had</p> <p>16 done a 24 hour round trip to collect a flash</p> <p>17 drive from his contact point in Europe.</p> <p>18 Q Why was that something important</p> <p>19 enough to note on your calendar on January</p> <p>20 31st?</p> <p>21 A Because it was important to show</p> <p>22 the delivery of when we were complying with an</p> <p>23 insistent Guo for information that he wanted to</p> <p>24 have yesterday.</p> <p>25 Q And then if you go back up to</p>
<p style="text-align: right;">Page 15</p> <p>1 FRENCH WALLOP</p> <p>2 sort of into the account that we were using or</p> <p>3 accessible until the -- truly until the 9th.</p> <p>4 Because we didn't -- we didn't</p> <p>5 have clean flash drives. We had had bad flash</p> <p>6 drives to begin with.</p> <p>7 So when we got the clean flash</p> <p>8 drive was when Mike and I got together with the</p> <p>9 team members for Team 1 that week.</p> <p>10 Because at that point then the</p> <p>11 money became hard that was in the account, and</p> <p>12 then we could begin the setup of getting the</p> <p>13 team started.</p> <p>14 So that's what ten days</p> <p>15 afterwards means; it was ten days after the</p> <p>16 16th.</p> <p>17 And Guo had said he was, you</p> <p>18 know, demanded to have massive amounts of</p> <p>19 information within ten days of setting up,</p> <p>20 which was highly unreasonable.</p> <p>21 Q Could you just decipher for us</p> <p>22 your entry on January 16th?</p> <p>23 A 16th.</p> <p>24 Wire out to Georgetown Research</p> <p>25 for \$200,000, and then I think another wire for</p>	<p style="text-align: right;">Page 17</p> <p>1 FRENCH WALLOP</p> <p>2 January 6th, where you wrote -- sorry, January</p> <p>3 5th, where you wrote "bad flash drives," do you</p> <p>4 see that?</p> <p>5 A Yes, that's correct.</p> <p>6 Q And you made that entry, you</p> <p>7 physically wrote that in your calendar on</p> <p>8 January 5th?</p> <p>9 A Yes.</p> <p>10 Q Why was it important for you to</p> <p>11 write that at that point in time?</p> <p>12 A Because we were supposed to be</p> <p>13 under contract, we had all these verbal</p> <p>14 agreements that had been bouncing back and</p> <p>15 forth like ping-pong balls, and Yvette arrived</p> <p>16 and she had bad flash drives.</p> <p>17 We had signed the contract, and</p> <p>18 then in order to download whatever it was that</p> <p>19 she had on her USB keys, I did that, and</p> <p>20 clearly it was a bad, bad flash drive.</p> <p>21 And it -- we agreed that I would</p> <p>22 have to come back to New York on, it must have</p> <p>23 been on Sunday, I remember, yes, it was Sunday,</p> <p>24 where I got the new flash drives.</p> <p>25 There were three flash drives,</p>

5 (Pages 14 - 17)

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1 FRENCH WALLOP  
2 and out of those three, only one was good, the  
3 other two were bad. In other words, that means  
4 there was malware in those flash drives.  
5 It's a reason for part of the  
6 delay.  
7 Q But you knew on January 5th that  
8 it would be important to document that they  
9 were bad?  
10 A Yes, absolutely.  
11 Q And what was the basis for that  
12 knowledge?  
13 A Because if they are bad, you  
14 need to make a note of that in your record, if  
15 you're monitoring something like this in the  
16 way of a project; perfectly reasonable.  
17 Q Can you turn to February,  
18 please?  
19 A Yes, I have it.  
20 Q Just if you could just read the  
21 entry on February 1st.  
22 A It says "Mars, Walmart."  
23 Q Does that have anything to do  
24 with Eastern Profit?  
25 A It may have been a phone call I

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1 FRENCH WALLOP  
2 had with some members of the Board. No, it had  
3 nothing to do with, probably should have been  
4 deleted.  
5 Q I should say that the items that  
6 have been redacted I gather have been redacted  
7 for relevance?  
8 A Because they pertain to other  
9 appointments or phone calls. Have nothing to  
10 do with Eastern Profit.  
11 Q On Groundhog Day there, what  
12 does your entry there say?  
13 A "Dallas" and then "Possible Team  
14 2."  
15 Q What did you mean by that?  
16 A Well, we decided we would go  
17 down and see Team 2.  
18 Q Why does this --  
19 A I mean, we assumed that it was  
20 going to be another team, because we were  
21 concerned about what Team 1 was finding, and  
22 Team 1 was finding all sorts of irregularities.  
23 So we wanted to have a second  
24 team to compare findings with.  
25 Q The entry says "POSS," is that

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1 FRENCH WALLOP  
2 possibly?  
3 A Possible.  
4 Q Possible?  
5 A Possible Team 2.  
6 Q So Team 2 had not been hired at  
7 this point?  
8 A No, I think we were just going  
9 there.  
10 Q And did you and Mr. Waller in  
11 fact go to Dallas to meet with Team 2?  
12 A Oh, yes, we did. I'm just  
13 looking, I think we went twice. So yes.  
14 Q And then most of these are just  
15 handwriting questions, February 5th, can you  
16 tell us what that entry says?  
17 A Sorry, I can't --  
18 That was a rigging group, if  
19 that's the right thing -- no, sorry, that looks  
20 like -- that was a meeting at 4:30 at my home  
21 with Lianchao and Mike.  
22 Q What was the -- it says here,  
23 does that mean it was at your home?  
24 A Yes.  
25 Q And what was the subject of that

Page 21

1 FRENCH WALLOP  
2 meeting?  
3 A Well, it would have had to do  
4 with the Guo contract.  
5 Q But just tell me as best you  
6 can, who said what to whom at that meeting on  
7 Monday, February 5th?  
8 A I have no recollection, other  
9 than we were concerned that we were finding  
10 issues with Guo's fake names and some of Guo's  
11 fake information that he had given us out of  
12 the 15 names that we had.  
13 And we were concerned about  
14 that, plus we also had inconsistencies with the  
15 information that we had gotten on Yvette's  
16 flash drives that we were using for Team 1.  
17 And at that point they were  
18 alerting us that there was a leak within the  
19 Guo system, from Yvette's flash drives, and we  
20 were very concerned as to what that was going  
21 to do with something that we held as being  
22 highly confidential and certainly of a concern.  
23 Q Did you share these concerns  
24 with Mr. Han?  
25 A Yes.

<p style="text-align: right;">Page 30</p> <p>1 FRENCH WALLOP</p> <p>2 A Because I have a number of</p> <p>3 people that would have helped me and did help</p> <p>4 me in pulling information on Guo and on his</p> <p>5 people, that he was asking for research on.</p> <p>6 Q You were pulling information on</p> <p>7 Guo in the --</p> <p>8 A For Guo.</p> <p>9 Q For Guo.</p> <p>10 Were those people part of Team</p> <p>11 1?</p> <p>12 A No.</p> <p>13 Q Were they part of Team 2?</p> <p>14 A No.</p> <p>15 Q So, who were those people?</p> <p>16 A They were additional people.</p> <p>17 Q Did Strategic Vision pay for any</p> <p>18 services of the people you are referring to?</p> <p>19 A I believe so, yes.</p> <p>20 Q Are you talking about Fletcher?</p> <p>21 A Yes.</p> <p>22 Q Did you meet with anyone else</p> <p>23 other than Fletcher?</p> <p>24 A I did.</p> <p>25 Q Who else?</p>	<p style="text-align: right;">Page 32</p> <p>1 FRENCH WALLOP</p> <p>2 and I were trying to figure out how to handle</p> <p>3 Guo, because of the fact that we were</p> <p>4 delivering information and nothing seemed to</p> <p>5 satisfy him.</p> <p>6 Q Did you and Mr. Waller and</p> <p>7 Mr. Lianchao discuss litigation at that meeting</p> <p>8 on February 25th?</p> <p>9 A No.</p> <p>10 Q Did you --</p> <p>11 A Never.</p> <p>12 Q Did you discuss whether</p> <p>13 Strategic Vision would interfere with Mr. Guo's</p> <p>14 asylum application at that meeting?</p> <p>15 A No.</p> <p>16 Q Did you ever have that</p> <p>17 conversation with Mr. Han?</p> <p>18 A No.</p> <p>19 Q There is an entry on -- do you</p> <p>20 happen to know whether February 2018 was a leap</p> <p>21 year?</p> <p>22 In other words, does that say</p> <p>23 February 29?</p> <p>24 A It's 28th.</p> <p>25 It just goes to 28. If you look</p>
<p style="text-align: right;">Page 31</p> <p>1 FRENCH WALLOP</p> <p>2 A That's sort of confidential.</p> <p>3 MR. GREIM: Let's keep it there</p> <p>4 for now. There is apparently an order</p> <p>5 in this case.</p> <p>6 I don't know if it covers this or</p> <p>7 not, but if it doesn't, we will give the</p> <p>8 answer.</p> <p>9 Just if we could do it when we take</p> <p>10 our next break.</p> <p>11 MS. CLINE: Okay.</p> <p>12 Q So you and Mr. Waller met with</p> <p>13 Mr. Han on February 25th after Eastern Profit</p> <p>14 had terminated the contract, right?</p> <p>15 A Yes.</p> <p>16 Q What did you all say to each</p> <p>17 other? First of all, was the meeting in</p> <p>18 person?</p> <p>19 A Yes.</p> <p>20 Q And it was at your home in</p> <p>21 Virginia?</p> <p>22 A Yes.</p> <p>23 Q What did you all say to each</p> <p>24 other at that meeting?</p> <p>25 A I'm sure that Mike and Lianchao</p>	<p style="text-align: right;">Page 33</p> <p>1 FRENCH WALLOP</p> <p>2 above, the calendar, it's 27/28, so there is no</p> <p>3 29.</p> <p>4 Q What's -- so the last, just</p> <p>5 humor me, the last column, the bottom column on</p> <p>6 the page, right, starts with the 25th.</p> <p>7 That's when you got home from</p> <p>8 London?</p> <p>9 A Right.</p> <p>10 Q 26th is blank, right?</p> <p>11 A Yes.</p> <p>12 Q 27th you did something at 9:30,</p> <p>13 but it's redacted, right?</p> <p>14 A Yes.</p> <p>15 Q 28th you did something at 11:10,</p> <p>16 but that's redacted, correct?</p> <p>17 A Correct.</p> <p>18 Q I am trying to figure out what</p> <p>19 the entry is on what would be February 29th</p> <p>20 there?</p> <p>21 A I can't really tell unless it</p> <p>22 just says "depart 6:00 a.m." So I don't know,</p> <p>23 where is the rest of the calendar?</p> <p>24 If you have the March calendar,</p> <p>25 I can maybe piece it together.</p>

<p style="text-align: right;">Page 34</p> <p>1 FRENCH WALLOP</p> <p>2 Q Did you take any, putting aside</p> <p>3 the calendar, do you remember whether you took</p> <p>4 any business trips with respect to the Eastern</p> <p>5 Profit matter subsequent to your trip to London</p> <p>6 where you got home on February 25th?</p> <p>7 A Yes.</p> <p>8 Q And describe those.</p> <p>9 A Well, without a calendar, I</p> <p>10 can't.</p> <p>11 Q You have no memory, you know you</p> <p>12 went somewhere, but you just don't remember</p> <p>13 what the nature of the trip was?</p> <p>14 A That's correct. Unless I look</p> <p>15 at the calendar I can be more explicit.</p> <p>16 Q Do you recall the purpose for</p> <p>17 making a trip after the contract had been</p> <p>18 terminated?</p> <p>19 A To continue gathering the</p> <p>20 information that was sitting and available to</p> <p>21 us to retrieve.</p> <p>22 But these things had to be done</p> <p>23 face-to-face, not by on the internet.</p> <p>24 MS. CLINE: Would you mark that,</p> <p>25 please.</p>	<p style="text-align: right;">Page 36</p> <p>1 FRENCH WALLOP</p> <p>2 Profit?</p> <p>3 A With Miles Guo, yes. We didn't</p> <p>4 know who Eastern Profit was until the contract</p> <p>5 turned up.</p> <p>6 Q And what were the -- so did you</p> <p>7 have communications with Mr. Guo about Exhibit</p> <p>8 112?</p> <p>9 A Yes.</p> <p>10 Q Describe those, please.</p> <p>11 A Well, we walked him through it</p> <p>12 based on the information that we had after we</p> <p>13 finally got a clean flash drive from Yvette</p> <p>14 Wang on how it would work.</p> <p>15 Because obviously we didn't have</p> <p>16 the 15 fish or the 10 fish names, so we could</p> <p>17 break out how the tracking would work with each</p> <p>18 one of these targets.</p> <p>19 So we didn't have the names, in</p> <p>20 other words, until we had gotten a clean flash</p> <p>21 drive, which was not until, what did I say?</p> <p>22 January 8th of 2018.</p> <p>23 Q Do you remember where you were</p> <p>24 when Strategic Vision walked Mr. Guo through</p> <p>25 Exhibit 112?</p>
<p style="text-align: right;">Page 35</p> <p>1 FRENCH WALLOP</p> <p>2 (The above described document was</p> <p>3 marked Exhibit SV 112 for identification,</p> <p>4 as of this date.)</p> <p>5 Q All right. We have handed you</p> <p>6 what's been marked as Exhibit 112, and the</p> <p>7 first question is just whether you can identify</p> <p>8 the document for us, please?</p> <p>9 A I believe it was one of the</p> <p>10 documents that we used to show, Strategic</p> <p>11 Vision used to show Guo how we would operate</p> <p>12 with each one -- with each specific fish in</p> <p>13 a -- in a sort of graph, so that he could</p> <p>14 understand it more clearly.</p> <p>15 Q Did you put Exhibit 112</p> <p>16 together?</p> <p>17 A No, I did not.</p> <p>18 Q Do you know who did?</p> <p>19 A I believe Michael. Michael and</p> <p>20 I talked about it, and then he put it together.</p> <p>21 Q It was put together before the</p> <p>22 contract was signed?</p> <p>23 A Yes.</p> <p>24 Q Did you use, did Strategic</p> <p>25 Vision use Exhibit 8 in a meeting with Eastern</p>	<p style="text-align: right;">Page 37</p> <p>1 FRENCH WALLOP</p> <p>2 A I do not.</p> <p>3 Q Do you remember when the meeting</p> <p>4 was?</p> <p>5 A Well, if we meet with Guo, it</p> <p>6 would have been in his apartment.</p> <p>7 Q And --</p> <p>8 A And I'm not sure which meeting</p> <p>9 it was, it might have been December.</p> <p>10 Sorry.</p> <p>11 Q I was confused by your testimony</p> <p>12 on this.</p> <p>13 A I'm confused actually right now.</p> <p>14 I think -- I think in fact that</p> <p>15 we did talk about it. He had this big file of</p> <p>16 names which he said he had paid \$250 million</p> <p>17 for, with all of these same names and</p> <p>18 photographs and everything else that he showed</p> <p>19 us early on.</p> <p>20 Which, if I go back to my</p> <p>21 calendar, I think that could have been either</p> <p>22 the 4th of December or the -- sorry, or the</p> <p>23 11th of December.</p> <p>24 It looks like maybe the 11th of</p> <p>25 December, because it shows I had put here</p>

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1 FRENCH WALLOP

2 A Yes, I came up to New York in a

3 snow storm and to the Pierre and met Yvette in

4 the Pierre lobby.

5 Q Just, there is a New York on

6 January 8th, what's the abbreviation before

7 that?

8 A Me, FW.

9 Q You refer to yourself in the

10 third person?

11 A Sometimes. FW New York, you

12 will see on here.

13 MW, FW, you will see many things

14 MW, FW.

15 Q So going back to Exhibit 112 --

16 A Yes.

17 Q -- just, fish means what?

18 A It was the term we used to

19 identify and tag each person that was in -- on

20 the list of people that Guo wanted to have

21 researched.

22 Q And what does unit mean?

23 A 23 units. Well, it was a very

24 complex way we were trying to set it up, so

25 that we could put fish in and take fish out at

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1 FRENCH WALLOP

2 the same time if they were not -- if the

3 information wasn't retrievable, if it wasn't

4 acceptable.

5 Either to Guo, in other words,

6 if it was just superficial information versus

7 really some good deep dives.

8 Q So, in the first scenario in

9 Exhibit 112 --

10 A Yes.

11 Q -- it contemplates a flat number

12 of fish, but not always 30 units, right?

13 A That's correct. And I think

14 that the 30 units 10, 10, and 10 makes the 30,

15 right, for 10 fish?

16 So we were looking at each

17 individual cell to see which ones we could dive

18 for certain information on in each one of these

19 cells.

20 And some of the cells were not

21 relevant or were not -- the information was not

22 there because they were either fake or the

23 names were wrong or whatever.

24 Q And in the scenario, in this

25 scenario on this first page, the Strategic

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1 FRENCH WALLOP

2 Vision says, "The unpredictable work in

3 pricing."

4 Do you see that?

5 A Yes.

6 Q That's the pricing is

7 unpredictable because the number of units

8 wasn't steady, correct?

9 A That's correct.

10 Q So the pricing was based per

11 unit, correct?

12 A Yes.

13 Q And then, if you go to the

14 second page of the same exhibit, if there are

15 always 30 units, then the pricing is

16 predictable, right?

17 A I guess so.

18 Again, this is a question for

19 Mike, because we tossed this thing back and

20 forth about ten times, discussing how the best

21 way would be for the tracking research to be

22 done.

23 That's a question also for him.

24 Q I might have gotten that one

25 wrong. I thought it was a question for you.

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1 FRENCH WALLOP

2 MR. GREIM: Actually, I will tell

3 you, we actually did say that this

4 document was for Ms. Wallop, but some of

5 the questions you are raising are going

6 back to contractual things that, as you

7 are asking the witness, she's saying

8 it's better for Mr. Waller.

9 So we did our best to try to find,

10 to try to divide these documents up and --

11 MS. CLINE: Yeah, well, we will

12 see how it goes. I would have asked him

13 about this had you designated it as

14 such.

15 MR. GREIM: Well, all right, I

16 guess if we have exhausted this witness

17 and there are some questions about the

18 document itself that we still need, then

19 we have got him here.

20 We can, I hate to do this, but

21 maybe we can put him back on at the end to

22 ask whatever the questions are.

23 I just want to know what those are,

24 to be clear, what it is that Ms. Wallop

25 isn't able to say about the document



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1 FRENCH WALLOP  
2 itself.  
3 I mean, because to be clear, we  
4 have had a lot of testimony already on  
5 what the fish were, what the contract  
6 means, that was all in the first  
7 deposition.  
8 I understand this is to be about  
9 this document --  
10 MS. CLINE: That's all I'm asking  
11 about.  
12 MR. GREIM: We should look at the  
13 transcript, because it occurs to me a  
14 lot of the questions are moving into the  
15 thing about fish and units and pricing,  
16 which I understand it springs from  
17 looking at the document, but those are  
18 questions that actually have been asked  
19 and answered a long time ago.  
20 So I don't -- we don't need to have  
21 a fight about it. Let's just see what the  
22 questions are about the document itself  
23 that she can't answer, and if there are  
24 some, we can put him on to answer those  
25 questions.

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1 FRENCH WALLOP  
2 MS. CLINE: Would you go back to  
3 the last question I asked.  
4 (The question requested was read  
5 back by the reporter.)  
6 Q So, I'm asking you, when this  
7 exhibit, this Power Point Exhibit 112 was  
8 discussed with Mr. Guo, was there a  
9 conversation around having pricing predictable  
10 and tied to units?  
11 A I believe so, yes.  
12 Q Tell me what you remember about  
13 that conversation.  
14 A We discussed -- he needed an  
15 example as to how this would work.  
16 So we chose the concept of fish  
17 in an aquarium, and he understood that.  
18 So that if we took -- we  
19 initially were going to take 10 fish, that was  
20 the deal, we would take 10 fish, the first  
21 time, the first month, and then see where that  
22 went.  
23 If we took the first 10 fish and  
24 we found that we, out of those 10, which they  
25 then decided oh, no, we wouldn't to make it 15

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1 FRENCH WALLOP  
2 fish in the first month, which actually  
3 unbalanced a lot of our programming as to how  
4 we were going to process the 10 plus 5 fish,  
5 making it 15 fish, it made us have to work 33  
6 percent harder to pull up additional numbers  
7 when we had only planned originally on the 10  
8 based on the budget.  
9 So our ability to walk him  
10 through what we could pull within a certain  
11 time frame, if we found that one or two of  
12 these fish were dead, we would throw them out  
13 of the tank and replace them with another fish,  
14 so with another name, and then we would go to  
15 work on those names to see how much we could  
16 pull up on those names.  
17 But it was -- when somebody  
18 tells you they have got 4,000 names they want  
19 investigated from the very beginning, we never  
20 expected to be doing 4,000 names, we expected  
21 to be able to work with about maybe 100 names  
22 over the year, over the course of a year.  
23 That's how we were sort of  
24 trying to balance out the numbers of the people  
25 that we were doing the research on based on

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1 FRENCH WALLOP  
2 what it was that he wanted in the way of  
3 information back.  
4 So again, it's really a much  
5 better question for Mike. He's the expert on  
6 this sort of --  
7 Q I will ask him if you don't  
8 know, but predictable pricing, that was  
9 something Strategic Vision was interested in?  
10 A Yeah, whatever, yes, predictable  
11 and unpredictable.  
12 Q Which?  
13 A Well, predictable pricing, if  
14 that's what you're talking about, is that what  
15 we are on, the 30 units?  
16 Q Yes.  
17 A Sorry.  
18 Q So, let me --  
19 A One is predictable and one is  
20 unpredictable.  
21 Q Let me try it this way, and if  
22 you don't know, we will ask Mr. Waller, but  
23 scenario number one entails or would result in  
24 unpredictable pricing, correct?  
25 A Correct.



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1      **CERTIFICATE**

2

3      I, the undersigned, a Certified

4      Shorthand Reporter of the State of New

5      York, do hereby certify:

6      That the foregoing proceedings were

7      taken before me at the time and place

8      herein set forth; that any witnesses in

9      the foregoing proceedings, prior to

10     testifying, were duly sworn; that a record

11     of the proceedings was made by me using

12     machine shorthand which was thereafter

13     transcribed under my direction;

14     That the foregoing transcript is a

15     true record of the testimony given.

16     Further, that if the foregoing

17     pertains to the original transcript of a

18     deposition in a federal case before

19     completion of the proceedings, review of

20     the transcript [ ] was [x] was not

21     requested.

22     I further certify I am neither


23     financially interested in the action nor a

24     relative or employee of any attorney or

25     party to this action.

IN WITNESS WHEREOF, I have this

date subscribed my name.



Stephen J. Moore  
RPR, CRR

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1      **DECLARATION UNDER PENALTY OF PERJURY**

2

3      Case Name: EASTERN v. STRATEGIC

4      Date of Deposition: November 19,

5      2019

6

7      I, FRENCH WALLOP, hereby certify

8      Under penalty of perjury under the

9      laws of the State of New York that the

10     foregoing is true and correct.

11     Executed this \_\_\_\_\_ day of

12     \_\_\_\_\_, 2019, at

13     \_\_\_\_\_.

14     \_\_\_\_\_

15

16     \_\_\_\_\_

17

18      **FRENCH WALLOP**

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1      **DEPOSITION ERRATA SHEET**

2

3      Case Name: EASTERN v. STRATEGIC.

4      Name of Witness: FRENCH WALLOP

5      Date of Deposition: November 19,

6      2019

7      Reason Codes: 1. To clarify the

8      record.

9      2. To conform to the facts.

10     3. To correct transcription errors.

11     Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

12     From \_\_\_\_\_ to \_\_\_\_\_

13     Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

14     From \_\_\_\_\_ to \_\_\_\_\_

15     Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

16     From \_\_\_\_\_ to \_\_\_\_\_

17     Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

18     From \_\_\_\_\_ to \_\_\_\_\_

19     Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

20     From \_\_\_\_\_ to \_\_\_\_\_

21     Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

22     From \_\_\_\_\_ to \_\_\_\_\_

23     Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

24     From \_\_\_\_\_ to \_\_\_\_\_

25     Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

26     From \_\_\_\_\_ to \_\_\_\_\_

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1      **DEPOSITION ERRATA SHEET**

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3     Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

4     From \_\_\_\_\_ to \_\_\_\_\_

5     Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

6     From \_\_\_\_\_ to \_\_\_\_\_

7     Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

8     From \_\_\_\_\_ to \_\_\_\_\_

9     Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

10    From \_\_\_\_\_ to \_\_\_\_\_

11    Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

12    From \_\_\_\_\_ to \_\_\_\_\_

13    Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

14    From \_\_\_\_\_ to \_\_\_\_\_

15    Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

16    From \_\_\_\_\_ to \_\_\_\_\_

17    \_\_\_\_\_ Subject to the above

18    changes, I certify that the transcript is

19    true and correct.

20    \_\_\_\_\_ No changes have been

21    made. I certify that the transcript is

22    true and correct.

23

24    \_\_\_\_\_

25    **FRENCH WALLOP**